

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

Case No.: 1:22-cv-1032 (PKC) (JRC)

-against-

**DECLARATION OF SHELDON
KATZ CERTIFYING RECORDS
PURSUANT TO FEDERAL RULE
OF EVIDENCE 902(11) and (12)**

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC, CLIENT
EXAM SERVICES LLC, and IME MANAGEMENT &
CONSULTING LLC,

Defendants.

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SHELDON KATZ, pursuant to 28 U.S.C. § 1746, hereby certifies as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in this declaration is based on my personal knowledge.
2. I am the Chief Operating Officer for Giant Partners, Inc (“Giant Partners”) and its custodian of records.
3. I submit this declaration in support of authenticating the documents Giant Partners produced in response to a subpoena dated April 8, 2024 served on it by the Plaintiff in the above-captioned matter.
4. The above-referenced records were made at or near the time of the events set forth therein by people with knowledge of those matters.
5. It was the regular practice of the business activity to make the records.
6. The records were kept in the regular course of Giant Partners’ business activity.

I certify under penalty of perjury that the foregoing is true and correct. Executed on May 7, 2024.

Sheldon Katz

SHELDON KATZ